

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re: Harriet E. Salley
Debtor

Case # 20-33649-KRH
Chapter 13

**Motion to Approve a
Mortgage Loan Modification**

COMES NOW, Harriet E. Salley, (“the Debtor”), by counsel, and pursuant to Local Rule 6004-4, files this Motion to Approve a Mortgage Loan Modification to assist with her financial fresh start. In support thereof, Debtor states as follows:

1. On August 29, 2020, the Debtor filed for relief under Chapter 13 of the Bankruptcy Code. Suzanne E. Wade is the Trustee of her estate.
2. Debtor is the record owner of real property and improvements thereon located at 6647 Wexford Lane, Richmond, VA 23225, (“the Property”), and more fully described in the attached Exhibit “A”.
3. The Property is not the Debtor's principal residence.
4. The Property is currently encumbered as follows: by a Deed of Trust between the Debtor and Citigroup Mortgage Loan Trust 2018-RP3, serviced by Fay Servicing, dated May 7, 2004, which Deed was recorded as Instrument 040016079 in the City of Richmond Circuit Court to secure a Note between the same parties in the original principal amount of \$154,275.00.
5. The Debtor has qualified for a Mortgage Loan Modification of her mortgage through Fay Servicing.
6. Under the terms of the modification, the Debtors' mortgage loan will be changed as follows:
 - a.) The interest rate will be unchanged at 6% (fixed) on a modified principal balance of \$154,751.17 with a new maturity date of May 1, 2043. The unmodified current balance shown in its proof of claim is \$148,196.09 (which include a delinquent amount of \$30,654.36) with a maturity date of June 1, 2034.
 - b.) The current mortgage payments are \$1,342.09, including taxes and hazard insurance. The new mortgage payment will be \$1,059.00 (\$1335.00 after the addition of \$276 for taxes and

Jeanne E. Hovenden, Esq
VSB 37249
P O Box 1839
Chesterfield VA 23832
804-706-1355

hazard insurance).

c.) The new mortgage payment is lower than the previous one by a very small amount. The Debtor will not be filing a modified Chapter 13 plan.

7. Modifying the mortgage will place the Debtor in a better financial condition and stabilize her mortgage situation.

8. Pursuant to Local Bankruptcy Rule 6004-4, the Debtor has served copies of this Motion to Approve a Mortgage Loan Modification upon all interested parties.

WHEREFORE, the Debtor respectfully requests that this Court enter an Order authorizing the Debtor to modify her mortgage pursuant to the terms of their modification agreement with

Respectfully submitted,
Harriet E. Salley

By: /s/Jeanne E. Hovenden
Counsel

Jeanne E. Hovenden, VSB#37249
Chesterfield Bankruptcy Law
P. O. Box 1839
Chesterfield, VA 23832
804-706-1355

CERTIFICATE OF SERVICE

I certify that on this September 7, 2021 the foregoing document was electronically served and/or mailed first class, postage prepaid to: U.S. Trustee's Office; Carl M. Bates, Chapter 13 Trustee; the Debtor, and to any creditor who has filed a request for all notices in this case.

/s/ Jeanne E. Hovenden
Jeanne E. Hovenden, VSB# 37249

Jeanne E. Hovenden, Esq
VSB 37249
P O Box 1839
Chesterfield VA 23832
804-706-1355

Label Matrix for local noticing 0422-3 Case 20-33649-KRH Eastern District of Virginia Richmond Mon Sep 6 14:09:59 EDT 2021	Fay Servicing, LLC c/o McCalla Raymer Leibert Pierce, LLC Bankruptcy Department 1544 Old Alabama Road Roswell, GA 30076-2102	U.S. Bank Trust National Association, not in BWW Law Group, LLC 8100 Three Chopt Road, Suite 240 Richmond, VA 23229-4833
United States Bankruptcy Court 701 East Broad Street Richmond, VA 23219-1888	American Express National Bank c/o Becket and Lee LLP PO Box 3001 Malvern PA 19355-0701	Amex Correspondence/Bankruptcy Po Box 981540 El Paso, TX 79998-1540
Amex/Bankruptcy Correspondence/Bankruptcy Po Box 981540 El Paso, TX 79998-1540	BCMB1 Trust SN Servicing Corporation 323 5th Street Eureka, CA 95501-0305	BWW Law Group 8100 Three Chopt Rd, Ste 240 Henrico, VA 23229-4833
Clearwater Pool Service 570 E. Hundred Road Chester, VA 23836-2617	Comenity Bank/Wayfair Attn: Bankruptcy Dept Po Box 182125 Columbus, OH 43218-2125	Credit Union Of Rich Po Box 26024 Richmond, VA 23260-6024
(p)CREDIT UNION OF RICHMOND ATTN NANCY ALLISON 1601 OWNBY LANE RICHMOND VA 23220-1318	Department Stores National Bank c/o Quantum3 Group LLC PO Box 657 Kirkland, WA 98083-0657	Fay Servicing Llc Attn: Bankruptcy Dept Po Box 809441 Chicago, IL 60680-9441
Harriet Salley Auto Sales LLC 4009 Mechanicsville Tpke Richmond, VA 23223-1117	Macys (p) RE: Bankruptcy P O Box 9001094 Louisville, KY 40290-1094	Navy Federal Credit Union Attn: Bankruptcy Po Box 3000 Merrifield, VA 22119-3000
Quantum3 Group LLC as agent for MOMA Trust LLC PO Box 788 Kirkland, WA 98083-0788	U.S. Bank Trust National Association et al. Fay Servicing, LLC PO Box 814609 Dallas, TX 75381-4609	USAA Federal Savings Bank Attn: Bankruptcy 10750 Mcdermott Freeway San Antonio, TX 78288-1600
W. Harold Talley 4905 Radford Ave Suite 200 Richmond, VA 23230-3525	Harriet E. Salley 4932 Topping Lane Glen Allen, VA 23060-2405	Jeanne E. Hovenden Jeanne E. Hovenden, P.L.L.C. 9830 Lori Road P O Box 1839 Chesterfield, VA 23832-9108
John P. Fitzgerald, III Office of the US Trustee - Region 4 -R 701 E. Broad Street, Ste. 4304 Richmond, VA 23219-1849	Suzanne E. Wade 341 Dial 877-996-8484 Code 2385911 7202 Glen Forest Drive, Ste. 202 Richmond, VA 23226-3770	

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Credit Union Of Richmond
1601 Ownby Lane
Richmond, VA 23220-0000

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)U.S. Bank Trust National Association, not	(u)W. Harold Talley I, LLC	End of Label Matrix	
BWW Law Group, LLC		Mailable recipients	25
8100 Three Chopt Road		Bypassed recipients	2
Suite 240		Total	27
Richmond, VA 23229-4833			